

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CONTRARIAN CAPITAL MANAGEMENT,
L.L.C., CONTRARIAN CAPITAL FUND I,
L.P., CONTRARIAN DOME DU GOUTER
MASTER FUND, LP, CONTRARIAN
CAPITAL SENIOR SECURED, L.P.,
CONTRARIAN EM II, LP, CONTRARIAN
EMERGING MARKETS, L.P., POLONIUS
HOLDINGS, LLC, and CONTRARIAN
FUNDS, L.L.C.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19 Civ. 11018 [rel. Nos. 19
Civ. 3123 & 18 Civ. 11940]

Hon. Analisa Torres

PLAINTIFFS' NOTICE OF MOTION FOR RELIEF UNDER 28 U.S.C. § 1610(C)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated March 15, 2021, the accompanying Declaration of Justin M. Ellis, dated March 15, 2021, Plaintiffs Contrarian Capital Management, L.L.C., Contrarian Capital Fund I, L.P., Contrarian Dome du Gouter Master Fund, LP, Contrarian Capital Senior Secured, L.P., Contrarian EM II, LP, Contrarian Emerging Markets, L.P., Polonius Holdings, LLC, and Contrarian Funds, L.L.C., by and through their undersigned counsel, move the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order under 28 U.S.C. § 1610(c) determining that a reasonable period of time has elapsed since this Court entered final judgment against Defendant Bolivarian Republic of Venezuela on October 16, 2020.

Dated: March 15, 2021
New York, New York

Respectfully submitted,

/s/ Steven F. Molo

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